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Attorneys for Plaintiff
LeGRANT G. ROMERO

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

LeGRANT G. ROMERO and DIANA
ROMERO,

Plaintiff,

vs.

UNITED STATES OF AMERICA; and
DOES 1 through 10, inclusive,

Defendants.

Case No: C 05-1216 MHP EDL
E-FILING CASE

Honorable Elizabeth D. Laporte

JOINT STIPULATION TO
CONTINUE DISCOVERY
DEADLINES; [PROPOSED]
ORDER

WHEREAS this case was filed on March 24, 2005 by plaintiffs LeGRANT ROMERO and DIANA ROMERO alleging causes of action for elder abuse, negligence and loss of consortium against defendant UNITED STATES OF AMERICA for the defendants' failure to provide the proper care and treatment of bedsores developed by plaintiff LeGRANT ROMERO.

WHEREAS the Court has set the trial to begin on November 13, 2006 at 8:30 a.m. in Courtroom E, 15th Floor, U.S. District Court, 450 Golden Gate Avenue, San Francisco, California.

WHEREAS the Court has Ordered all non-expert discovery to be completed

1 no later than March 17, 2006.

2 WHEREAS the Court has Ordered that initial expert disclosures shall be
3 completed no later than March 31, 2006 and rebuttal expert disclosures shall be
4 made no later than April 28, 2006.

5 WHEREAS the Court has Ordered that all expert discovery shall be
6 completed no later than June 23, 2006.

7 WHEREAS, despite the due diligence of all parties, the parties have been
8 unable to schedule certain depositions that are critical to the prosecution and
9 defense of this action and it is likely that these depositions will not be completed
10 within the above-referenced deadlines.

11 IT IS HEREBY STIPULATED by and between plaintiffs LeGRANT
12 ROMERO, DIANA ROMERO, and defendant UNITED STATES OF AMERICA,
13 by and through their respective attorneys, as follows:

- 14 1. The parties do hereby agree to continue the completion date for all
15 non expert discovery from March 17, 2006 to May 16, 2006.
- 16 2. The parties do hereby agree to continue expert disclosure date from
17 March 31, 2006 to May 30, 2006.
- 18 3. The parties do hereby agree to continue all expert discovery from June
19 23, 2006 to August 22, 2006.

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21 Dated: February 2, 2006

McNulty Law Firm

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23 By: /s/ Brett L. Rosenthal
24 Brett L. Rosenthal
Attorney for Plaintiffs

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1 Dated: February 2, 2006

United States Department of Justice

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3 By: /s/ Owen P. Martikan
4 Owen P. Martikan
5 Attorney for Defendants

6
7 **[PROPOSED] ORDER**

8 PURSUANT TO STIPULATION, IT IS SO ORDERED.

9
10 DATED: February 3, 2006

